



Amber S. Finch
Direct Phone: +1 213 457 8046
Email: afinch@reedsmith.com

Reed Smith LLP
355 South Grand Avenue
Suite 2900
Los Angeles, CA 90071-1514
+1 213 457 8000
Fax +1 213 457 8080
reedsmith.com

June 19, 2020

RE: *Roc Nation, LLC v. HCC International Insurance Company, PLC*; Case No.: 1:19-cv-00554

Dear Judge Engelmayer:

We write to request permission, pursuant to Section 4(B) of Your Honor's Individual Rules and Practices, to file two unreacted documents and two confidential deposition transcript excerpts under seal as exhibits to Roc Nation's response to HCC's letter request for a pre-motion conference, filed at ECF No. 139.

The Stipulated Confidentiality Agreement and Protective Order in this case [ECF No. 43] (the "Protective Order") allows counsel to designate deposition testimony as Confidential under Section 4. This obligates the party to file that confidential testimony under seal. Roc Nation's response cites deposition testimony from two of HCC's Fed. R. Civ. Proc. 30(b)(6) witnesses on pertinent drafting, underwriting, and placement issues, and the respective exhibits discussed in the cited deposition excerpts. The transcripts are both marked confidential. As a result, Roc Nation is requesting to file Exhibits C & E to its letter response under seal.

With respect to the redactions, Section 2 of the Protective Order permits any party to designate documents as "Confidential" where necessary to protect its interests in proprietary or otherwise sensitive non-public information. Exhibits A & B are claim correspondence sent by HCC to Roc Nation containing proprietary and non-confidential information about Roc Nation's and CAM's finances and other confidential information about and agreement pertaining to the wrap up negotiations of CAM. The document is also marked confidential by Roc Nation consistent with the Protective Order. In an attempt to keep the sealing request as narrow as necessary, Roc Nation seeks permission to file the redacted versions of these letters publically with the unredacted versions filed under seal. These redactions remove the confidential and proprietary information from the letter such that the pertinent part of the letters can be filed publically.

Good cause exists for granting this request. The request is submitted under the terms and for the reasons set forth the Protective Order, and the parties understood that their confidentiality designations would apply when they were exchanging information and taking depositions in order to avoid objections preventing the disclosure of material that would be relevant in discovery and for settlement discussions, but which the parties would not agree to make publically available. Furthermore, and as stated above, Roc Nation has attempted to narrow this request to the extent possible.

Very truly yours,
/s/ Amber Finch
Amber S. Finch

Granted.

SO ORDERED.

PAUL A. ENGELMAYER
United States District Judge

June 22, 2020